

EXHIBIT S

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JEAN LAWNICZAK, as Personal)	CIVIL ACTION NO. 2:17-cv-00185
Representative of the ESTATE OF)	
JOHN ORLANDO, Deceased)	
)	
Plaintiff,)	
)	HONORABLE LISA PUPO LENIHAN
v.)	
)	
ALLEGHENY COUNTY,)	
ORLANDO HARPER, SIMON)	
WAINWRIGHT and/or JOHN)	
and/or JANE DOE)	
)	
Defendants)	

DEFENDANT'S ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES,
RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS, REQUEST FOR
ADMISSION AND REQUEST FOR INSPECTION

The Plaintiff hereby requests that the Defendants answer the following Interrogatories within thirty (30) days of service hereof, in writing and under oath, in accordance with Rule 33 and \34 of the Federal Rules of Civil Procedure.

These discovery requests are intended to be continuing in nature, and the Defendants' responses are to be supplemented and/or corrected in the event that additional information is obtained at any later date up to and including the time of trial.

The Defendants are hereby notified that the Plaintiff will request that the Court preclude the Defendants from introducing at trial any evidence relating to the subject matter of these Interrogatories which has not been disclosed by the Defendants' answers or supplemental answers.

15. Please provide a copy of a map and/or blueprint of the facility that show the proximity of the detox unit to the suicide watch unit.

RESPONSE:

The Mental Health Unit is Pod 5F and the Acute Mental Health unit (suicide watch) is Pod 5C. Both units are on level five of the Allegheny County Jail, and there are approximately 100 feet apart.

16. Please provide photographs of the facility that show the detox area and the suicide watch area.

RESPONSE:

The deceased was in the Mental Health Unit, part 5F. He was not in the “detox” area, which is Pod 5B.

III. REQUESTS FOR ADMISSION

1. Admit that the Defendant’s Jail possessed facilities/an area designated for suicide watch/suicidal inmates.

RESPONSE: **Admitted.**

2. Admit that Plaintiff’s Decedent made suicidal ideations during the intake procedure in question.

RESPONSE: **Denied. The deceased statements speak for themselves. He was not evaluated as being suicidal when he left the intake area.**

3. Admit that Plaintiff’s Decedent expressed a dependency on drugs and/or having a substance abuse problem during the intake procedure in question.

RESPONSE: **Denied. Orlando made conflicting statements regarding his drug use. Plaintiff’s decedent was not evaluated as requiring “suicide watch.”**

4. Admit that Plaintiff's Decedent was not placed on suicide watch.

RESPONSE: Admitted. Plaintiff's decedent was not evaluated as requiring "suicide watch." However, he was double-celled until shortly before his suicide and guards make rounds every 15 minutes on Pod 5F.

IV. REQUEST FOR INSPECTION

1. Plaintiff requests an examination and inspection of the Defendant's Jail with respect to the intake department, detox unit and suicide watch unit.

RESPONSE: Defendant's will consider request for inspection at appropriate time, in the alternative the defendants may provide drawings or sketches of the units, start up, the intake department, detox unit and suicide watch unit.

LAW OFFICES OF JOEL SANSONE

s/Massimo A. Terzigni
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Dated: October 24, 2017

As to the Answers Only:

Respectfully submitted,

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